



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Jerry Salera, UIC Program Manager
California Division of Oil, Gas and Geothermal Resources
801 K Street, MS 18-00
Sacramento, CA 95814-3530

Dear Mr. Salera:

For the past few years, the California Division of Oil, Gas and Geothermal Resources (DOGGR) has contributed annual injection well inventory data electronically to Region 9 as follows:

	Data Source	Data Prepare/Submit	Data Retrieve/QA
DOGGR Class II Data	Microsoft Access database for injection and production figures per month, per injection well (sorted on API number)	Query database and spreadsheet to identify injection wells, translate well types and status; repurpose locational detail to well identifiers in national table Create HQ-acceptable mdb using DOGGR data and placeholders that point back to the appropriate district	Download copy of data received by national tables to assure that data integrity was maintained and that interpretations enabled by the data comport with DOGGR's inventory
DOGGR Class V Geothermal	Microsoft Excel spreadsheet for geothermal injection wells, sorted on API number	Use CDX client to submit .mdb file	

Region 9's efforts to extract the nationally required data elements in 2011 and 2012 to a format acceptable by the national UIC database proved that it can be done, however, we had difficulty agreeing on the interpretation of the source files. Further, distribution of federal UIC grants to delegated programs utilizes inventory counts of open wells to determine each program's share of the national grant allocation. There is no grant condition to submit inventory data electronically in order to receive the proportionate share. However, this is likely to change.

EPA recommends that beginning this calendar year, DOGGR prepare and vet internally its inventory submission file and submit it directly to the national Underground Injection Control database via the node client. EPA Region 9 would remain involved by providing DOGGR with a receipt copy of the data, and participating in data quality review. To this end, we request that you assign DOGGR staff to this task.

Please have them contact Elizabeth Janes by April 5, 2013, to schedule a meeting to review the data preparation and submission protocols, reporting schedule, and the data map. It is our goal for the DOGGR data contact to have all of the tools in place to annually create and submit an inventory data file before September 30, 2013.

If you would like to discuss this further, I can be reached at (415) 972-3417. Alternatively, you can reach me or Elizabeth by email at dermer.michele@epa.gov or janes.elizabeth@epa.gov.

Sincerely,

Michele Dermer
Acting Manager, Ground Water Office (WTR-9)

3/15/13

Ec: Robin